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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

Paula Self, Linda Duncan, Sheri Kiddy, Leslie
Demull, Timothy Van Hoose, Michael Combs,
Isabel Shelton, Ramy Ibrahim, Scott Wright,
Wilda Sellers, Damon Hylton, Deyaska
Spencer, Larry Clark, Lativia Williams, Kevin
Stagner, James Hannah, Louis Tavizon,
Anthony Outrich, Joy Golembiewski, Leon
Brown, Jeremy Hines, Jennifer Luton, Alma
Uresti, Brenda Weatherspoon, and Richard
Wooldridge Individually and on Behalf of
Others Similarly Situated,

Plaintiffs,

vs.

TPUSA, Inc. and Teleperformance Group,
Inc., Corporations,
Defendants.

**PLAINTIFFS' MOTION FOR
APPROVAL OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

Case No.: 2:08-CV-395 PMW

Judge: Hon. Paul M. Warner

Counsel for the Plaintiffs hereby respectfully submit this motion for award of attorneys' fees and reimbursement of expenses.¹ Plaintiffs' Counsel respectfully request that the Court award attorneys' fees of \$1,400,000. The requested fee equals 35% of the Common Fund. As set forth more fully in the Memorandum in Support for Plaintiffs' Unopposed Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, an award of 35% of the monetary relief, comprising both an award of attorneys' fees and reimbursement of reasonable litigation costs, is both reasonable and consistent with federal law. Plaintiffs' Counsel also request that the Court approve \$101,923.84 in litigation expenses reasonably incurred (including anticipated expenses in the amount of \$2500 for travel and other costs for the final settlement hearing) by Plaintiffs' Counsel to date. The expenses were necessary to prosecute this complex litigation and are reasonable in amount.

Respectfully submitted, this 18th day of March, 2010.

/s/Jesse S. Brar
Sharon Preston
Jesse S. Brar
Patrick Solomon
Nelson Thomas
Michael Lingle
Annette Gifford

Attorneys for Plaintiffs

¹ Defendant stipulated in the Settlement Agreement (Docket No. 188, Agreement ¶ 29) that it would not oppose Plaintiff's application for approval of fees and costs.

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2010, I electronically filed a true and correct copy of the foregoing with the Court using the CM/ECF system and served it by the method indicated below on the following:

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- ☐ Hand Delivered
- ☐ Overnight Mail
- ☐ Facsimile
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/s/Jesse S. Brar
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